

CONTACTOR SUBMITTAL					Date 2/18/11		
PROJECT NAME: San Jacinto Waste Pits							
CONTRACTOR:	USA Environment LP		Subcontract No.		Sub.No	15A	
To:	John LaPlante	References:	RAWP				
		Drawing/Spec:					
Subject:	Emergency Contingency Plan	Detail/Section:					
		Discipline:					
Response Requested By:				High Priority:	<input checked="" type="checkbox"/>	Low Priority:	<input type="checkbox"/>
Potential Impact:		TCRA		Cost:	<input type="checkbox"/>	Schedule:	<input checked="" type="checkbox"/>
Attached is the final ECP for review and approval with revisions discussed with EPA Region VI..							
Routing:		Date Sent	Date Received	COMMENTS			
		2/18/11					
Reply:		<input type="checkbox"/> Conforms to design concept <input type="checkbox"/> Conforms to design concept with revisions shown <input type="checkbox"/> Revise and resubmit <input checked="" type="checkbox"/> For information only <u>Comments:</u>					
Addressee: Sign and return original to:		Approved By:	Vicinity Map, Sample Results,				
		Name:	and Dioxin Public Health				
Glenn Smalley		Title:	Statements added by Anchor QEA to				
		Date:	the submitted ECP.				

This submittal has been reviewed for general conformance to design concept only. This review does not relieve the contractor or supplier of full responsibility for adhering to the contract document and satisfactory completion of all work.

By:  Date: 02-18-2011
Anchor QEA, LLC

EMERGENCY CONTINGENCY PLAN
SAN JACINTO RIVER
WASTE PITS SUPERFUND SITE
CHANNELVIEW, HARRIS COUNTY, TEXAS

February 17, 2011

Site Background

The San Jacinto River Waste Pits Superfund Site (Site) is located on the western bank of the San Jacinto River, east of Houston, in Harris County, Texas (Figure 1). On March 19, 2008, The United States Environmental Protection Agency (USEPA) listed the Site on the National Priorities List (NPL). USEPA issued an Administrative Order on Consent (AOC), Docket No. 06-12-10, to International Paper Company (IPC) and the McGinnes Industrial Maintenance Corporation (MIMC), collectively the Respondents, in April 2010. The 2010 AOC directs the Respondents to conduct a Time Critical Removal Action (TCRA) on a portion of the Site (the TCRA Site).

The TCRA Site consists of a set of impoundments approximately 15.7 acres in size, built in the mid-1960s for disposal of paper mill wastes. The set of impoundments is located on a 20-acre parcel on the western bank of the San Jacinto River, in Harris County, Texas, immediately north of the Interstate Highway 10 (I-10) Bridge over the San Jacinto River.

In 1965 and 1966, pulp and paper mill wastes (both solid and liquid) were reportedly transported by barge and unloaded at the Site into the impoundments. The wastes deposited in the impoundments have recently been found to be contaminated with polychlorinated dibenzo-p-dioxins, polychlorinated furans (dioxins and furans), and some metals (TCEQ and USEPA 2006). Physical changes at the Site in the 1970s until present include regional subsidence of land in the area. This has resulted in submergence of the eastern impoundment and partial submergence of the western impoundment and exposure of the dioxin waste into the San Jacinto River.

Description of Threat(s)

The TCRA Site (Site) contains concentrations of dioxins/furans and metals in both sediments and soil (Source Materials). Source Materials concentrations range as high as 31,600 nanograms per kilogram (ng/kg) TEQ in recent sampling. The concentration of dioxins and furans, expressed as a Toxicity Equivalent (TEQ), found in recent surface sediment and soil sampling within the TCRA work area is shown on Figure 2. EPA initiated the TCRA to address these Source Materials.

A Material Safety Data Sheet (MSDS) for dioxins and furans is not available, however, a public health statement, prepared by the U.S. Department of Health and Human Services, Public Health Service Agency for Toxic Substances and Disease Registry is included as Attachment A. This public health statement is one chapter of a 720 page volume that provides more information on the toxicological profile of dioxins and furans. The entire report can be downloaded at <http://www.atsdr.cdc.gov/toxprofiles/tp104.pdf>.

Additional threats are primarily related to the natural environment and site utilities. Work in and adjacent to the river presents hazardous construction conditions. Buried and above-ground utilities are present along access corridors to the TCRA Site.

The exclusion zone and restricted area for the site is the boundary of the former waste pits (Figure 1). An additional laydown and stockpile area, as well as a separate administration area are located off site.

Construction Activities

The Respondent's Contractor is engaging in the following active construction activities:

- Stockpiling, management, and loading of aggregate at an offsite leased facility (the LaBarge property). There is no documented soil contamination in this portion of the work area.
- Grading and improvement of a haul road along the TxDOT right-of-way (ROW) to provide access to the waste pits. Soil sampling that was conducted within this portion of the work area indicates that dioxin/furan levels in ROW soils are below residential soil quality standards.
- Stockpiling, management, and loading of aggregate at stockpile and turn-around areas located on the TxDOT ROW. Soil sampling that was conducted within this portion of the work area indicates that dioxin/furan levels in ROW soils are below residential soil quality standards.
- Clearing and grubbing of vegetation in the western cell of the waste pits. Elevated dioxin/furan concentrations have been encountered in soil samples collected from the western cell of the Site. This area is within the exclusion zone
- Placement of geomembrane, geotextile, and aggregate cap over the cleared area of the western cell.
- Placement of geotextile and aggregate cap over sediments present in the eastern cell and

northwestern areas of the Site. Elevated dioxin/furan concentrations have been encountered in sediment samples collected from these areas of the Site. These areas are within the exclusion zone and restricted access areas.

Anyone entering the exclusion zone is required to wear **OSHA level D** personal protective equipment.

Potential Response Events

The following protocols for the exclusion and restricted access zones provide necessary guidance for the following potential response events:

- Vandalism / Trespassing
- Medical Emergencies
- Fire / Explosion
- Inclement Weather (Hurricane/Flood/Tornado)

Vandalism / Trespassing

If an event of vandalism / trespassing occurs at the Site, the Harris County Sheriff's Department will respond (without entry into the exclusion zone) and coordinate the Respondents Contractor USA Environment, LP (USA). Attempts will be made to communicate with offenders from the site perimeter. Attempts will be made to apprehend the offenders following their egress from the site. If any trespassing or vandalism incidents occur, USA should be immediately notified of the situation. If any vandalism or trespassing occurs outside of the exclusion or restricted access zones, standard local protocols will be utilized by the Harris County Sheriff's Department.

Medical Emergencies

Medical emergencies which occur within the exclusion zone will be coordinated by decontaminating and removing injured personnel from the exclusion zone to the support zone. Rescue operations may be performed in **OSHA level D** personal protection inside the exclusion zone area only if it is not possible for the injured person to be brought outside to Emergency Medical Services (EMS) personnel. USA crews may assist with decontamination of the victim prior to the arrival of ambulance service on site if needed. The victim will be picked up at the support zone by EMS personnel.

The victim should be decontaminated in **OSHA level D** personal protection equipment to the maximum

extent possible, paying particular attention to the areas of the body or clothing that were known to be in contact with site contaminants. If the injury is minor, a full decontamination should be completed and first aid administered prior to transport. If the victim's condition is serious, at a minimum, emergency decontamination should be completed. For emergencies requiring transport to a hospital, the victim should be transported to Triumph Hospital – East Houston located at 15101 East Freeway, Channelview TX 77530. A map showing directions to Triumph Hospital – East Houston from the San Jacinto River Waste Pits Superfund site is included as Figure 2.

Fire / Explosion

In the event of a fire / explosion within the exclusion zone, the Channelview Volunteer Fire Department will be notified immediately. The first-arriving engine officer will assume control of firefighting operations. All other supporting personnel will meet at an upwind location and await assignment of duties. If necessary, the Channelview Volunteer Fire Department will evacuate any residents located in the immediate vicinity. The members of the Channelview Volunteer Fire Department will access the fire from a perimeter location without entering the site exclusion zone unless absolutely necessary. Effective immediately, no one is to enter the exclusion zone for fire fighting purposes without appropriate PPE. All fire fighting for this should be attempted from a perimeter position if possible. Contact numbers of personnel who should be contacted in the event of an incident are listed on the attached page. At a minimum, the following personnel should be notified:

- USA On-site Supervisor
- Harris County EMS

In the event of heavy smoke or toxic gas emission, an evacuation may be necessary and should proceed according to Local Emergency Planning Committee and County Emergency Management Agency (LEPC-EMA) guidelines. USA may assist with any necessary air monitoring or air sampling and will be coordinated through AnchorQEA. AnchorQEA and the Respondents should be notified as soon as possible to communicate any chemical spill information to local, state, and federal stakeholders.

Inclement Weather

All site personnel will monitor for inclement weather conditions. If thunder is present, the threat of being struck by lightning exist, thus safe shelter should be taken immediately. Listen to NOAA Weather Radio or commercial radio for the latest weather forecasts. As the storm approaches, find shelter in a building or

vehicle. Avoid using the any electrical appliances. If caught outside, go to a low-lying, open place away from trees, poles, or metal objects. Make sure the select a location that is not subject to flooding. Make yourself the smallest target possible by squatting low to the ground. Do not lie flat on the ground this will make you a larger target!

In the event of or threat of extreme inclement weather conditions such as hurricanes, floods, or tornadoes; daily briefings will be held to keep all site personnel informed and updated. Using his/her best professional judgment, the USA On-site Supervisor may order a stop work order to all contractors in the event of severe weather approaching. When issued, it is expected that the order is immediately followed by all remaining personnel regardless of affiliation or station.

Attachment A
Public Health Statement – Dioxins and Furans

**TOXICOLOGICAL PROFILE FOR
CHLORINATED DIBENZO-*p*-DIOXINS**

**U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Agency for Toxic Substances and Disease Registry**

December 1998

1. PUBLIC HEALTH STATEMENT

This public health statement tells you about chlorinated dibenzo-*p*-dioxins (CDDs) and the effects of exposure.

The Environmental Protection Agency (EPA) identifies the most serious hazardous waste sites in the nation. These sites make up the National Priorities List (NPL) and are the sites targeted for long-term federal clean-up. CDDs (all types) have been found in at least 126 of the 1,467 current or former NPL sites. However, it's unknown how many NPL sites have been evaluated for these substances. As more sites are evaluated, the number of sites with CDDs may increase. This is important because exposure to these substances may harm you and because these sites may be sources of exposure.

When a substance is released from a large area, such as an industrial plant, or from a container, such as a drum or bottle, it enters the environment. This release does not always lead to exposure. You can be exposed to a substance only when you come in contact with it. You may be exposed by breathing, eating, or drinking the substance or by skin contact.

If you are exposed to CDDs, many factors determine whether you'll be harmed. These factors include the dose (how much), the duration (how long), and how you come in contact with it. You must also consider the other chemicals you're exposed to and your age, sex, diet, family traits, lifestyle, and state of health.

1.1 WHAT ARE CDDs?

CDDs are a family of 75 different compounds commonly referred to as polychlorinated dioxins. These compounds have varying harmful effects. The CDD family is divided into eight groups of chemicals based on the number of chlorine atoms in the compound. The group with one chlorine atom is called the mono-chlorinated dioxin(s). The groups with two through eight chlorine atoms are called di-chlorinated dioxin (DCDD), tri-chlorinated dioxin (TrCDD), tetra-chlorinated dioxin (TCDD), penta-chlorinated dioxin (PeCDD), hexa-chlorinated dioxin (HxCDD), hepta-chlorinated dioxin (HpCDD), and octa-chlorinated dioxin (OCDD). The chlorine atoms can be attached to the dioxin molecule at any one of eight positions. The name of each CDD indicates both the number

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and the positions of the chlorine atoms. For example, the CDD with four chlorine atoms at positions 2, 3, 7, and 8 on the dioxin molecule is called 2,3,7,8-tetrachlorodibenzo-*p*-dioxin or 2,3,7,8-TCDD. 2,3,7,8-TCDD is one of the most toxic of the CDDs to mammals and has received the most attention. Thus, 2,3,7,8-TCDD serves as a prototype for the CDDs. CDDs with toxic properties similar to 2,3,7,8-TCDD are called “dioxin-like” compounds.

In the pure form, CDDs are colorless solids or crystals. CDDs enter the environment as mixtures containing a variety of individual components and impurities. In the environment they tend to be associated with ash, soil, or any surface with a high organic content, such as plant leaves. In air and water, a portion of the CDDs may be found in the vapor or dissolved state, depending on the amount of particulate matter, temperature, and other environmental factors. 2,3,7,8-TCDD is odorless. The odors of the other CDDs are not known. CDDs are known to occur naturally, and are also produced by human activities. They are naturally produced from the incomplete combustion of organic material by forest fires or volcanic activity. CDDs are not intentionally manufactured by industry, except in small amounts for research purposes. They are unintentionally produced by industrial, municipal, and domestic incineration and combustion processes. Currently, it is believed that CDD emissions associated with human incineration and combustion activities are the predominant environmental source.

CDDs (mainly 2,3,7,8-TCDD) may be formed during the chlorine bleaching process used by pulp and paper mills. CDDs occur as a contaminant in the manufacturing process of certain chlorinated organic chemicals, such as chlorinated phenols. 2,3,7,8-TCDD is a by-product formed during the manufacture of 2,4,5-trichlorophenol (2,4,5-TCP). 2,4,5-TCP was used to produce hexachlorophene (used to kill bacteria) and the herbicide, 2,4,5-trichlorophenoxyacetic acid (2,4,5-T). Various formulations of 2,4,5-T have been used extensively for weed control on crops and range lands, and along roadways throughout the world. 2,4,5-T was a component of Agent Orange, which was used extensively by the U.S. military in the Vietnam War. In most industrialized countries the use of products contaminated with CDDs has been greatly reduced. Use of hexachlorophene and the herbicide 2,4,5-T is currently restricted in the United States. Other chlorinated chemicals, like pentachlorophenol (PCP), used to preserve wood, do contain some of the more highly chlorinated CDDs (those with more chlorine atoms), but 2,3,7,8-TCDD is not usually found. The use of PCP has been restricted to certain manufacturing applications.

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Currently, CDDs are primarily released to the environment during combustion of fossil fuels (coal, oil, and natural gas) and wood, and during incineration processes (municipal and medical solid waste and hazardous waste incineration). While incineration may be the primary current source of release of CDDs into the environment, the levels of CDDs produced by incineration are extremely low. CDDs are associated with ash generated in combustion and incineration processes. Emissions from incinerator sources vary greatly and depend on management practices and applied technologies. CDDs also have been detected at low concentrations in cigarette smoke, home-heating systems, and exhaust from cars running on leaded gasoline or unleaded gasoline, and diesel fuel. Burning of many materials that may contain chlorine, such as plastics, wood treated with pentachlorophenol (PCP), pesticide-treated wastes, other polychlorinated chemicals (polychlorinated biphenyls or PCBs), and even bleached paper can produce CDDs.

Although this public health statement will focus on CDDs, it is important to note that CDDs are found in the environment together with other structurally related chlorinated chemicals, such as chlorinated dibenzofurans (CDFs) and polychlorinated biphenyls (PCBs). Therefore, people are generally exposed to mixtures of CDDs and other classes of toxicologically and structurally similar compounds. 2,3,7,8-TCDD is one of the most toxic and extensively studied of the CDDs and serves as a prototype for the toxicologically relevant or “dioxin-like CDDs. Based on results from animal studies, scientists have learned that they can express the toxicity of dioxin-like CDDs as a fraction of the toxicity attributed to 2,3,7,8-TCDD. For example, the toxicity of dioxin-like CDDs can be half or one tenth or any fraction of that of 2,3,7,8-TCDD. Scientists call that fraction a Toxic Equivalent Factor (TEF). More information on TEFs can be found in Section 2.5.

For more information on CDDs, please refer to Chapters 3, 4, and 5.

1.2 WHAT HAPPENS TO CDDs WHEN THEY ENTER THE ENVIRONMENT?

CDDs are released into the air in emissions from municipal solid waste and industrial incinerators. Exhaust from vehicles powered with leaded and unleaded gasoline and diesel fuel also release CDDs to the air. Other sources of CDDs in air include: emissions from oil- or coal-fired power plants, burning of chlorinated compounds such as PCBs, and cigarette smoke. CDDs formed during combustion processes are associated with small particles in the air, such as ash. The larger particles will be deposited close to the emission source, while very small particles may be

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transported longer distances. Some of the lower chlorinated CDDs (DCDD, TrCDD, and some of the TCDDs) may vaporize from the particles (and soil or water surfaces) and be transported long distances in the atmosphere, even around the globe. It has been estimated that 20 to 60% of 2,3,7,8-TCDD in the air is in the vapor phase. Sunlight and atmospheric chemicals will break down a very small portion of the CDDs, but most CDDs will be deposited on land or water.

CDDs occur as a contaminant in the manufacture of various chlorinated pesticides and herbicides, and releases to the environment have occurred during the use of these chemicals. Because CDDs remain in the environment for a long time, contamination from past pesticide and herbicide use may still be of concern. In addition, improper storage or disposal of these pesticides and waste generated during their production can lead to CDD contamination of soil and water.

CDDs are released in waste waters from pulp and paper mills that use chlorine or chlorine-containing chemicals in the bleaching process. Some of the CDDs deposited on or near the water surface will be broken down by sunlight. A very small portion of the total CDDs in water will evaporate to air. Because CDDs do not dissolve easily in water, most of the CDDs in water will attach strongly to small particles of soil or organic matter and eventually settle to the bottom. CDDs may also attach to microscopic plants and animals (plankton) which are eaten by larger animals, that are in turn eaten by even larger animals. This is called a food chain. Concentrations of chemicals such as the most toxic, 2,3,7,8-chlorine substituted CDDs, which are difficult for the animals to break down, usually increase at each step in the food chain. This process, called biomagnification, is the reason why undetectable levels of CDDs in water can result in measurable concentrations in aquatic animals. The food chain is the main route by which CDD concentrations build up in larger fish, although some fish may accumulate CDDs by eating particles containing CDDs directly off the bottom.

CDDs deposited on land from combustion sources or from herbicide or pesticide applications bind strongly to the soil, and therefore are not likely to contaminate groundwater by moving deeper into the soil. However, the presence of other chemical pollutants in contaminated soils, such as those found at hazardous waste sites or associated with chemical spills (for example, oil spills), may dissolve CDDs, making it easier for CDDs to move through the soil. The movement of chemical waste containing CDDs through soil has resulted in contamination of groundwater. Soil erosion

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and surface runoff can also transport CDDs into surface waters. A very small amount of CDDs at the soil surface will evaporate into air. Certain types of soil bacteria and fungus can break CDDs down, but the process is very slow. In fact, CDDs can exist in soil for many years. Plants take up only very small amounts of CDDs by their roots. Most of the CDDs found on the parts of plants above the ground probably come from air and dust and/or previous use of CDD-containing pesticides or herbicides. Animals (such as cattle) feeding on the plants may accumulate CDDs in their body tissues (meat) and milk.

For more information on what happens to CDDs in the environment, see Chapter 5.

1.3 HOW MIGHT I BE EXPOSED TO CDDs?

CDDs are found at very low levels in the environment. These levels are measured in nanograms and picograms. One nanogram (ng) is one billionth of a gram, and one picogram (pg) is one trillionth of a gram. In some contaminated soils, concentrations of CDDs are reported as parts per billion. One part per billion (ppb) is one part CDD per billion parts of soil. The concentration of CDDs is often reported as parts per trillion, in samples of air, water, or soil. One part per trillion (ppt) is one part CDD per trillion parts of air, water, or soil. In some rural areas where CDD concentrations are very low in air or water, measurements are given in parts per quadrillion (ppq), which means one part CDD per quadrillion parts of air or water.

CDDs are found everywhere in the environment, and most people are exposed to very small background levels of CDDs when they breathe air, consume food or milk, or have skin contact with materials contaminated with CDDs. For the general population, more than 90% of the daily intake of CDDs, CDFs, and other dioxin-like compounds comes from food, primarily meat, dairy products, and fish. CDDs may be present at much lower levels in fruits and vegetables. The actual intake of CDDs from food for any one person will depend on the amount and type of food consumed and the level of contamination. Higher levels may be found in foods from areas contaminated with chemicals, such as pesticides or herbicides, containing CDDs as impurities. CDDs have been measured in human milk, cow's milk, and infant formula, so infants are known to be exposed to CDDs.

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Most surface water in the United States typically does not contain 2,3,7,8-TCDD and other CDDs at levels that are high enough to be measured (1 ppq or more). Municipal drinking water does not usually contain CDDs because the CDDs do not dissolve in water and primarily stick to particles, which are usually filtered out of treated drinking water. This means that using tap water to wash clothes or to bathe or shower, or swimming in pools or in uncontaminated lakes, rivers, or at ocean beaches will not expose people to significant levels of CDDs. Although CDDs are not usually found in filtered, treated drinking water, they have, on occasion, been detected in unfiltered groundwater from areas with known CDD contamination.

Exposure to CDDs can also occur through skin contact with chlorinated pesticides and herbicides, contaminated soils, or other materials such as PCP-treated wood and PCB transformer fluids. Background levels of CDDs in soil are higher than background levels in both air and water. Background levels of CDDs detected in uncontaminated soils in the United States are generally very low or not detectable. 2,3,7,8-TCDD is not usually found in rural soil, but is typically found in soil in industrialized areas at levels ranging from 0.001 to 0.01 ppb. However, higher levels of 2,3,7,8-TCDD may be found in areas where CDDs have contaminated the soil. For example, contaminated soil at Times Beach, Missouri, had levels of 2,3,7,8-TCDD ranging from 4.4–317 ppb.

If CDDs are present at all in outdoor air in rural areas, they are generally present at very low levels or at concentrations near the detection limits for testing equipment. In winter, because of the burning of wood and other fuels for home heating, CDD levels may be slightly higher than during other seasons. In general, the background air levels of CDDs in urban areas are higher than in rural areas. Typical levels of CDDs in outdoor air in urban areas and industrial areas averaged 2.3 picograms per meter cubed (pg/m^3). 2,3,7,8-TCDD is not usually found in rural or urban air, but it is found in air near urban waste incinerators and high-traffic areas. The air around people who are smoking cigarettes may also have CDDs at levels above background levels. Although breathing contaminated air is a minor route of exposure for most people, exposure may be greater in areas near these CDD sources.

CDDs have been found in all samples of adipose tissue and blood (serum lipids) from individuals with no known previous exposure. This indicates that all people are exposed to small amounts of CDDs. Levels of 2,3,7,8-TCDD in serum from the general population typically range from 3 to

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7 ppt (on a lipid basis), and rarely exceed 10 ppt. Typically, lower levels of CDDs are found in less industrialized countries and in younger people.

The production, use, and disposal of pesticides and phenoxy herbicides, disposal of production waste containing 2,3,7,8-TCDD, industrial accidents involving 2,4,5-trichlorophenol (2,3,5-TCP), and the consumption of CDD-contaminated food, have all led to increased potential for excess exposure of some groups of people. 2,3,7,8-TCDD has been detected at 91 of the 126 hazardous waste sites on the NPL that have been reported to contain CDDs. People living around these sites may be exposed to above-background levels of 2,3,7,8-TCDD and other CDDs. Elevated levels of CDDs have been reported in fish, shellfish, birds, and mammals collected in areas surrounding various chemical production facilities, various hazardous waste sites, and pulp and paper mills using the chlorine bleaching process. Sometimes these findings have resulted in closure of these areas for the purpose of fishing. People who eat contaminated food from these contaminated areas are at risk of increased exposure to CDDs.

Occupational exposure to CDDs generally occurs through breathing contaminated air, or through skin contact with materials containing CDDs. Workers with the potential to be exposed to above-average levels of CDDs include those involved in the production or handling of certain chlorinated phenols (such as 2,4,5-TCP, PCP) or chlorinated pesticides or herbicides (such as 2,4,5-T, 2,4-D, hexachlorophene, Silvex[®]), and those involved in application of chlorinated pesticides containing CDDs as impurities. Workers whose jobs involve pressure treatment of wood with PCP and the handling of PCP-treated wood products, chlorination processes at pulp and paper mills, or operation of municipal solid waste or hazardous waste incinerators may have increased exposure to CDDs. Finally, workers involved in hazardous waste clean-up or clean-up of PCB transformer and/or capacitor fires including emergency service personnel like fire fighters and police who respond to such fires are also at additional risk of exposure to CDDs. Most of these occupational exposures have been significantly reduced in recent years.

In general, workers involved in the manufacture of 2,4,5-TCP and subsequent products were exposed to far greater levels of 2,3,7,8-TCDD than those involved in the handling and application of chlorinated pesticides containing CDDs. Current serum lipid levels of 2,3,7,8-TCDD in a small number of U.S. Air Force veterans who were directly involved in the aerial spraying of herbicides (Agent Orange contaminated with 2,3,7,8-TCDD) in Vietnam as part of Operation Ranch Hand,

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are up to 3 times higher than the general population. However, while studies on blood or fatty tissue 2,3,7,8-TCDD levels in U.S. Army ground combat Vietnam veterans also found some individuals with 2,3,7,8-TCDD levels higher than those of the general population, overall, most Vietnam veterans and Vietnamese living in Vietnam studied to date have blood and fatty tissue 2,3,7,8-TCDD levels comparable to members of the general U.S. population.

For more information on exposure to CDDs, see Chapter 5.

1.4 HOW CAN CDDs ENTER AND LEAVE MY BODY?

CDDs can enter your body when you breathe contaminated air, eat contaminated food, or have skin contact with contaminated soil or other materials. The most common way CDDs can enter your body is by eating food contaminated with CDDs.

If you breathe air that contains CDDs, the CDDs can enter your body through your lungs and pass into the blood stream, but we do not know how fast or how much of the CDDs will enter the blood stream. If you swallow food or water containing CDDs, most of the CDDs will enter your body and pass from the intestines to the blood stream. Smaller amounts of highly chlorinated CDDs will enter your body compared to the less chlorinated 2,3,7,8-TCDD. If you swallow soil containing CDDs, a small amount of the CDDs will pass through the intestines into the blood stream. If soil contaminated with CDDs comes into contact with your skin, some of the CDDs will enter the body but we do not know how fast they will enter the blood stream.

Once in your body, CDDs can be found in most tissues with the highest amounts found in the liver and body fat (adipose tissue). Body fat and possibly the liver can store CDDs for many years before eliminating them from the body. CDDs with chlorine atoms in the 2, 3, 7, and 8 positions and highly chlorinated dioxins, such as OCDD, are generally found in higher concentrations in the fat than other CDDs.

Little is known about CDDs breakdown in the human body. Studies in animals show that some of the 2,3,7,8-TCDD from food is slowly broken down. There is evidence from animals suggesting that the break-down products are less harmful than the unchanged 2,3,7,8-TCDD.

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For people, the average time it takes to remove one-half of the 2,3,7,8-TCDD from the body is highly variable and may take from 7 to 12 years. There is less information on the other CDDs, but what information exists suggests 5 to 15 years. CDDs are eliminated from the body primarily in the stool, and only a small amount leaves the body in the urine. Some CDDs will leave the body in the breast milk of nursing mothers.

Much less is known about how much other CDD compounds will enter the body, how much will be stored in the body and for how long, and how they are removed from the body.

For more information about how CDDs can enter and leave your body, see Chapter 2.

1.5 HOW CAN CDDs AFFECT MY HEALTH?

Many studies have looked at how CDDs can affect human health. Most of these studies examined workers exposed during the manufacture of chemicals and pesticides contaminated with 2,3,7,8-TCDD. Other studies have looked at American Vietnam veterans and Vietnamese populations exposed to Agent Orange and populations exposed to 2,3,7,8-TCDD as a result of an accident. The workers and Vietnam veterans were most likely exposed to 2,3,7,8-TCDD mainly through breathing and skin contact. People who were accidentally exposed to 2,3,7,8-TCDD in Seveso, Italy, or Times Beach, Missouri, were probably exposed through eating and drinking contaminated food and milk, breathing contaminated particles and dust, through skin contact with contaminated soil and through unintentional hand-to mouth activity. Epidemiology is an inexact science and many of the human studies have many shortcomings which make it difficult for scientists to establish an association between 2,3,7,8-TCDD exposure levels and health effects. A common problem with most of the human studies is that the people are exposed to a number of chemicals at the same time. In most human health studies, we do not know how much 2,3,7,8-TCDD people were exposed to or how long the exposure lasted. In other studies, the people were examined many years after they were exposed and some of the effects may have not have been present at the time of examination or the effects observed may not have been caused by 2,3,7,8-TCDD. Some of the more recent studies have measured 2,3,7,8-TCDD levels in the blood or fat tissue of exposed populations. The levels of 2,3,7,8-TCDD in the blood or fat tissue can be used to estimate the extent of past exposures.

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A number of effects have been observed in people exposed to 2,3,7,8-TCDD levels which are at least 10 times higher than background levels. The most obvious health effect in people exposed to relatively large amounts of 2,3,7,8-TCDD is chloracne. Chloracne is a severe skin disease characterized by acne-like lesions. Chloracne generally occurs on the face and upper body, but may occur elsewhere on the body. Unlike common acne, severe chloracne is harder to cure and can be more disfiguring. In milder cases, the lesions heal several months after exposure ends. In more severe cases, the lesions may last for many years after exposure. Most of the chloracne cases have been attributed to accidental exposure to high doses of 2,3,7,8-TCDD. Other effects to the skin, such as erythematous or red skin rashes, discoloration, and excessive body hair, have been reported to occur in people following exposure to high concentrations of 2,3,7,8-TCDD. Changes in blood and urine that may indicate liver damage have been observed in people. Alterations in the ability of the liver to metabolize (or breakdown) hemoglobin, lipids, sugar, and protein have been reported in people exposed to relatively high concentrations of 2,3,7,8-TCDD. Most of the effects are considered mild and were reversible. However, in some people these effects may last for many years. Slight increases in the risk of diabetes and abnormal glucose tolerance have been observed in some studies of people exposed to 2,3,7,8-TCDD. We do not have enough information to know if exposure to 2,3,7,8-TCDD will result in reproductive or developmental effects in people, but animal studies suggest that this is a potential health concern. Several studies of workers exposed to high levels (with body burdens more than 50 times higher than background body burden levels) of 2,3,7,8-TCDD suggest that exposure to 2,3,7,8-TCDD may increase the risk of cancer in people.

The Department of Health and Human Services (DHHS) has determined that it is reasonable to expect that 2,3,7,8-TCDD may cause cancer. The International Agency for Research on Cancer (IARC) has determined that 2,3,7,8-TCDD can cause cancer in people, but that it is not possible to classify other CDDs as to their carcinogenicity to humans. The EPA has determined that 2,3,7,8-TCDD is a probable human carcinogen when considered alone and when considered in association with phenoxy herbicides and/or chlorophenols. The EPA has determined also that a mixture of CDDs with six chlorine atoms (4 of the 6 chlorine atoms at the 2, 3, 7, and 8 positions) is a probable human carcinogen.

To protect the public from the harmful effects of toxic chemicals and to find ways to treat people who have been harmed, scientists use many tests.

1. PUBLIC HEALTH STATEMENT

One way to see if a chemical will hurt people is to learn how the chemical is absorbed, used, and released by the body; for some chemicals, animal testing may be necessary. Animal testing may also be used to identify health effects such as cancer or birth defects. Without laboratory animals, scientists would lose a basic method to get information needed to make wise decisions to protect public health. Scientists have the responsibility to treat research animals with care and compassion. Laws today protect the welfare of research animals, and scientists must comply with strict animal care guidelines.

The health effects of some CDDs have been extensively studied in animals. Some CDDs are much more toxic than others. 2,3,7,8-TCDD and, to a lesser extent, CDDs with five (penta) or six (hexa) chlorine atoms substituted in the 2, 3, 7, and 8 positions, are extremely toxic to animals. Other CDDs, which do not have chlorine atoms substituted in the 2, 3, 7, and 8 positions, are considered relatively less toxic compared to 2,3,7,8-TCDD.

2,3,7,8-TCDD has been the most extensively studied CDD and it has been shown to cause a large number of adverse health effects in animals. There are always going to be some difficulties in using animal data to quantify health risks in people. In general, the doses used in the animal studies result in body burdens that are at least 10 times higher than human background body burdens, often the animal studies use doses that are over 1,000 times higher than human background levels. Some animal species are much more acutely sensitive to 2,3,7,8-TCDD than others. For example, it takes several thousand times more 2,3,7,8-TCDD to kill a hamster than a guinea pig. The reason for the difference in sensitivity among species is currently being investigated. For other effects, such as reproductive toxicity, there is very little difference in sensitivity between hamsters and guinea pigs. Another consideration in using animal data to predict health effects in people exposed to CDDs in the environment is the design of the animal studies. In most of the animal studies, the animals were exposed to only 2,3,7,8-TCDD, the most toxic CDD. 2,3,7,8-TCDD is rarely the main CDD found in the environment and people are typically exposed to a number of CDDs and compounds with similar toxic actions. Until scientists learn more about possible differences between people and animals, levels recommended to be of little or no risk to human health are based on the more sensitive species and the assumption that effects in animals could occur in people. This approach is further justified on the basis that humans are likely to exhibit a wide range of sensitivities to various health effects and the need to protect the most susceptible individuals.

1. PUBLIC HEALTH STATEMENT

In certain animal species, 2,3,7,8-TCDD is especially harmful and can cause death after a single exposure to small amounts. Before death, animals may lose as much as 40% or more of their body weight following a single dose of 2,3,7,8-TCDD. Exposure to non-lethal levels added in their food can cause a variety of adverse effects in animals, such as weight loss, biochemical and degenerative changes in the liver. Some animals that were exposed to CDDs in their food had effects to the skin such as hair loss, swelling of the face, and moderate to severe chloracne. In many species of animals, the immune system appears to be extremely sensitive to 2,3,7,8-TCDD. At relatively low levels (approximately 10 times higher than human background body burdens), 2,3,7,8-TCDD weakens the immune system and causes a decrease in the system's ability to fight foreign substances such as bacteria and viruses.

Exposure to 2,3,7,8-TCDD can cause reproductive damage and birth defects in animals. Decreases in fertility, altered levels of sex hormones, reduced production of sperm, and increased rates of miscarriages were found in animals exposed to 2,3,7,8-TCDD in food. Rats and mice that were exposed to small amounts of 2,3,7,8-TCDD in food for a long time developed cancer of the liver and thyroid, and other types of cancer.

The results of the oral animal studies suggest that the most sensitive effects (effects that will occur at the lowest doses) are immune, endocrine, and developmental effects. It is reasonable to assume that these will also be the most sensitive effects in humans.

We know less about the ability of other CDDs to cause adverse health effects. However, it appears that all CDDs with chlorine in the 2, 3, 7, and 8 positions have similar effects to 2,3,7,8-TCDD but the effects occur at higher doses.

Relatively large amounts of 2,3,7,8-TCDD applied to the skin of some animal species have resulted in deaths. Smaller amounts have resulted in weight loss, acne-like sores on the skin, and biochemical and degenerative changes in the liver. In addition, mice that had 2,3,7,8-TCDD repeatedly applied to their skin developed skin cancer. Although effects in animals following exposure through the skin have not been as extensively studied as effects following exposure in food, they appear to be quite similar. The ability of other CDDs to cause adverse health effects in animals following exposure to the skin has not been well studied.

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You can find out more information on the health effects of CDDs in Chapter 2.

1.6 HOW CAN CDDs AFFECT CHILDREN?

This section discusses potential health effects from exposures during the period from conception to maturity at 18 years of age in humans. Potential effects on children resulting from exposures of the parents are also considered.

Very few studies have looked at how CDDs can affect children's health. Chloracne has been observed in children exposed to much higher than current background levels of 2,3,7,8-TCDD. The children appeared to be more sensitive (effects occurred at a lower body burden) than adults. We do not know why children are more sensitive than adults to this effect. It is likely that children exposed to higher than background levels will have similar effects as adults.

We do not know if exposure to CDDs will result in birth defects or other developmental effects in people. Birth defects have been observed in animals exposed to higher than background levels of 2,3,7,8-TCDD. The developing animal is very sensitive to 2,3,7,8-TCDD. In some studies, effects were observed at body burdens 10 times higher than human background body burden levels. Offspring of animals exposed to 2,3,7,8-TCDD in food during pregnancy often had severe birth defects including bleeding, skeletal deformities, kidney defects, weakened immune responses, impaired development of the reproductive system, and learning and behavioral impairments. Exposure to other CDDs, such as 2,7-DCDD, 1,2,3,7,8-PeCDD, OCDD, and HxCDD, can also result in developmental effects in animals.

We have no information to suggest that there are any differences between children and adults in terms of how much CDDs will enter the body, where CDDs can be found in the body, and how fast CDDs will leave the body. CDDs from the mother can enter her unborn baby through the placenta. It can also be transferred from the mother to infant through breast milk. Because CDDs have been measured in human milk, cows milk, and infant formula, nursing infants are also exposed to CDDs. In most cases the beneficial aspects (biological and psychological) of breast-feeding outweigh any risks from exposure to CDDs from mother's milk.

1. PUBLIC HEALTH STATEMENT

1.7 HOW CAN FAMILIES REDUCE THE RISK OF EXPOSURE TO CDDs?

If your doctor finds that you have been exposed to significant amounts of CDDs, ask your doctor if children may also be exposed. When necessary your doctor may need to ask your state Department of Public Health to investigate.

Structural material used in building homes such as chemically treated lumber for decking and plastic PVC pipes used in water pipes and other conduits can release CDDs if they are burned as refuse during construction or if there is a structural fire in your home. To avoid exposures from some of these sources, construction refuse should not be burned near your home especially when children are out playing.

Children may be exposed to CDDs from ingestion of contaminated soil or by contact of contaminated soil with their skin. However, skin contact with contaminated soil will result in much less CDDs entering the blood stream than if they ingest contaminated soil. Also, the amount of CDDs that will pass to the blood stream after eating contaminated soil will depend on the type of soil and on how tight the CDDs are bound to the soil. Children should be restricted from playing near any known hazardous waste sites. Some children eat a lot of dirt. Discourage your children from eating dirt or from putting their toys or other foreign objects in their mouths that may be contaminated with soil. Make sure that your children wash their hands frequently, especially before eating. Discourage your children from putting their hands in their mouths or other hand-to-mouth activities.

Older children may be exposed to CDDs if they smoke cigarettes. Younger children and infants may be exposed by inhaling the second-hand smoke from their parents or other adult smokers. Parents should talk to their children about the dangers of smoking cigarettes.

You and your children are likely to be exposed to very low amounts of CDDs in the diet particularly when you consume meat, milk, other dairy products, and fish. This represents the major source of background exposure to CDDs in most people. Children and adults should eat a balanced diet preferably containing low to moderate amounts of animal fats including meat and dairy products, and fish that contain higher amounts of CDDs and eat larger amounts of fruits, vegetables and grains.

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You or your children may be exposed to CDDs by eating certain types of fish or wildlife caught in certain locations. A number of states have advisories for CDDs in fish and shellfish species; and one state has a wildlife advisory in effect for wood ducks. Each state, Native American tribe, or U.S. Territory sets its own criteria for issuing fish and wildlife advisories. A fish advisory will specify which waterbodies have restrictions, and a wildlife advisory will specify which hunting areas have restrictions. The advisory will tell you what types and sizes of fish or game are of concern. The advisory may completely ban eating fish or game or recommend that you limit the number of meals you eat of a certain species. For example, an advisory may tell you to eat a certain type of fish no more than once a month. The advisory may also tell you only to eat certain parts of the fish or game animal and how to prepare or cook the fish or game to decrease your exposure to CDDs. Fish and wildlife advisories are often stricter for pregnant women, nursing mothers, and young children. To reduce your children's exposure to CDDs, obey all fish and wildlife advisories. Information on Fish and Wildlife Advisories in your state is available from your state Public Health Department, or state Natural Resources Department and signs may be posted in certain fishing and hunting areas.

1.8 IS THERE A MEDICAL TEST TO DETERMINE WHETHER I HAVE BEEN EXPOSED TO CDDs?

Specific tests exist to measure CDD levels in samples of body fat, blood, and breast milk, but these tests are not routinely available. All people now have some levels of CDDs in their body fat and blood. Levels of 2,3,7,8-TCDD on a lipid basis are generally below 10 pg/g of lipid (ppt) in the blood and fatty tissue of the general population of the United States, and usually range from 3 to 7 ppt. Levels higher than these indicate past exposure to above-normal levels of 2,3,7,8-TCDD. Although CDDs stay in the body fat for a long time (see Section 1.4), tests are not used to determine when exposure occurred, but can be used to estimate dose of the exposure if the time of exposure is known.

Although exposure to 2,3,7,8-TCDD has been associated with adverse health effects in people, no one effect is specifically related to exposure to CDDs. There are laboratory tests which can indicate whether you have been exposed to CDDs, but these are costly and take weeks to perform and they cannot be used to predict whether you will develop harmful health effects.

1. PUBLIC HEALTH STATEMENT

1.9 WHAT RECOMMENDATIONS HAS THE FEDERAL GOVERNMENT MADE TO PROTECT HUMAN HEALTH?

The federal government develops regulations and recommendations to protect public health. Regulations can be enforced by law. Federal agencies that develop regulations for toxic substances include the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the Food and Drug Administration (FDA).

Recommendations provide valuable guidelines to protect public health but cannot be enforced by law. Federal organizations that develop recommendations for toxic substances include the Agency for Toxic Substances and Disease Registry (ATSDR) and the National Institute for Occupational Safety and Health (NIOSH).

Regulations and recommendations can be expressed in not-to-exceed levels in air, water, soil, or food that are usually based on levels that affect animals, then they are adjusted to help protect people. Sometimes these not-to-exceed levels differ among federal organizations because of different exposure times (an 8-hour workday or a 24-hour day), the use of different animal studies, or other factors.

Recommendations and regulations are also periodically updated as more information becomes available. For the most current information, check with the federal agency or organization that provides it. Some regulations and recommendations for CDDs include the following:

The government has developed regulations and guidelines for 2,3,7,8-TCDD. These are designed to protect the public from the potential adverse health effects of the chemical. The Food and Drug Administration (FDA) recommends against consuming fish and shellfish with 2,3,7,8-TCDD levels greater than 50 ppt. Such levels have resulted in the closing of several commercial fishing areas. In addition, EPA has issued guidance to states on how to evaluate health risks to recreational and subsistence fishers, and how to issue fish consumption advisories when concentrations of CDDs in fish and shellfish pose a risk to these populations. Currently, 66 health advisories have been issued by 21 states restricting consumption of fish and wildlife contaminated with CDDs. EPA also has recommended limits on how much 2,3,7,8-TCDD can be present in drinking water. EPA advises that children should not have more than 1 nanogram 2,3,7,8-TCDD per liter of water (ng/L) (ppt) in 1 day, or more than 0.01 ng/L per day for long-term exposure.

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For long-term exposure in adults, EPA recommends that there should not be more than 0.04 ng/L (ppt) in drinking water.

Human milk can contain higher levels of CDDs than cow's milk. Therefore, breast-fed infants can be exposed to higher levels of CDDs on a body weight basis than adults. The World Health Organization (WHO) has concluded that this risk to infants does not outweigh the positive biological and psychological benefits of breast-feeding at general population levels of dioxins. However, the specific concentration at which CDD levels in human milk would lead to harmful health effects in infants has not yet been determined.

Regulation of many of the sources of CDDs appears to have been successful in reducing the amount of CDDs entering the ecosystem and in decreasing the potential for human exposure. EPA and ATSDR listed 2,3,7,8-TCDD as hazardous substance. Many regulations govern its destruction and disposal. See Chapter 7 for more information on regulations and guidelines.

1.10 WHERE CAN I GET MORE INFORMATION?

If you have any more questions or concerns, please contact your community or state health or environmental quality department or

Agency for Toxic Substances and Disease Registry
Division of Toxicology
1600 Clifton Road NE, Mailstop E-29
Atlanta, GA 30333

* Information line and technical assistance

Phone: 1-800-44701544
Fax: (404) 639-6359

ATSDR can also tell you the location of occupational and environmental health clinics. These clinics specialize in recognizing, evaluating, and treating illnesses resulting from exposure to hazardous substances.

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* To order toxicological profiles, contact:

National Technical Information Service
5285 Port Royal Road
Springfield, VA 22161
Phone: (800) 553-6847 or (703) 487-4650

ATTACHMENT B

**SAN JACINTO RIVER
WASTE PITS SUPERFUND SITE
CHANNELVIEW, HARRIS COUNTY, TEXAS
LIST OF CONTACTS**

Local/State	Contact	Phone Number
<i>Harris County EMS/Fire</i>	NA	911
<i>Channelview Volunteer Fire Department</i>	NA	911 Non-emergency # (281) 452-5782
<i>Harris County Sheriff Department</i>	NA	911 Non-emergency # (713) 221-6000
<i>Harris County Health Department – Environmental Public Health Division</i>	Jacque Darbonne Manager – Emergency Response	To be Provided
<i>Texas Commission of Environmental Quality</i>	Linda Vasse Regional Director	713.767.3500
<i>Harris County LEPC – Greater Baytown LEPC</i>	Misty Lowe LEPC Contact	281.420.6556
<i>USEPA Region VI Emergency Response Hotline</i>	NA	1.866.EPA.SPIL (1.866.372.7745)
USA Environment, LP		
<i>USA On-site Supervisor*</i>	Ron Griffith Site Supervisor	713.213.6366 (cell) 24hrs.
<i>USA Project Manager</i>	Cesar Garcia Project Manager	832.641.0265 (cell) 24hrs.
Respondent's Construction Oversight		
<i>AnchorQEA</i>	Randy Brown Construction Oversight	281.979.7338 (cell) 24hrs.
<i>Anchor QEA</i>	David Keith Project Coordinator	228.818.9631 (cell) 24hrs.
Respondents		
<i>McGinnes Industrial Maintenance Corp.</i>	Andrew Shafer Project Manager	713.772.9100 832.724.3802 (cell) 24hrs.
<i>International Paper Co.</i>	Phil Slowiak Project Manager	901.419.9550 901.604.1952 (cell) 24hrs.

*** denotes primary contact for all emergency conditions.**

Figure 1
Site Map

K:\Jobs\090557-San Jacinto\090557-01 - San Jacinto\09055701-RP-049.dwg FIG 1-1
Aug 30, 2010 8:51am c davidson

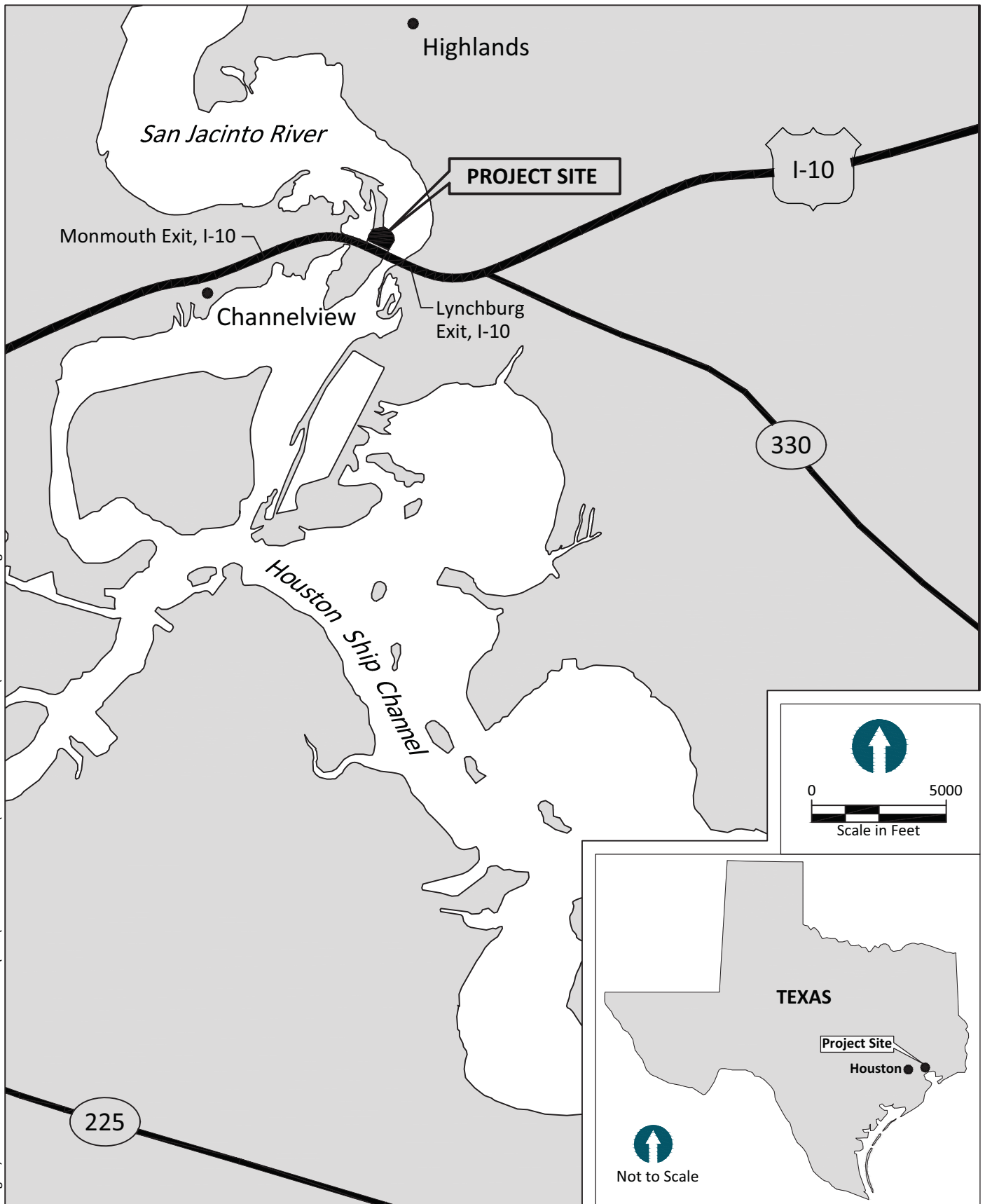
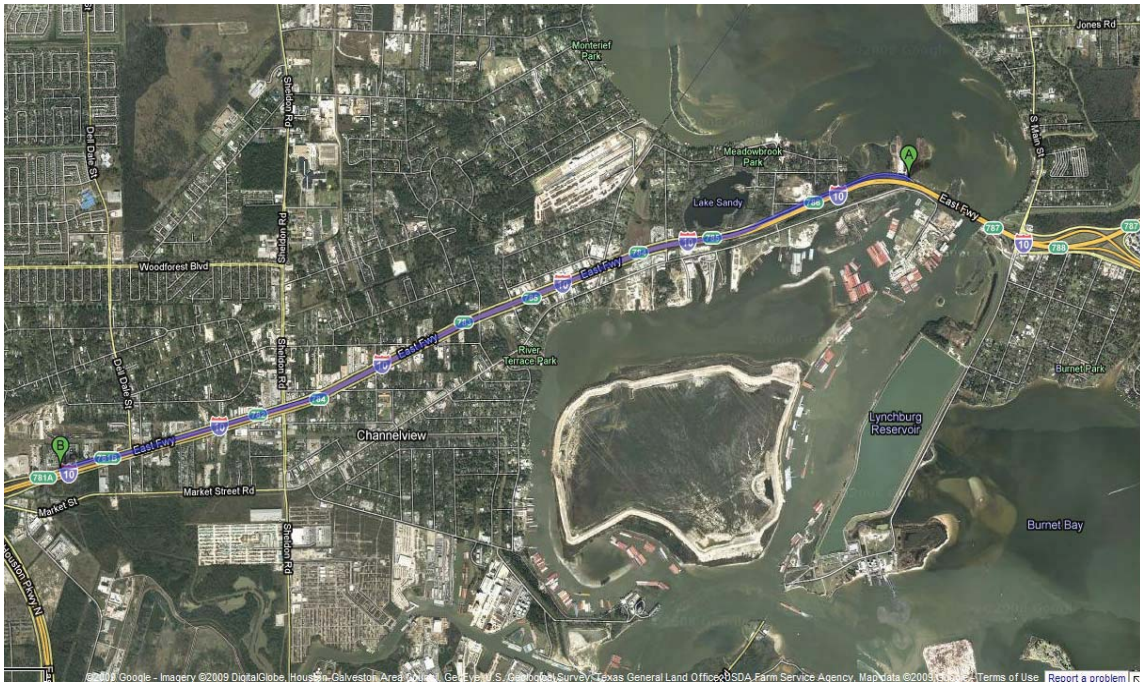


Figure 1
Vicinity Map

Figure 2
Sample Concentration Map

Figure 3
Map Directions to Triumph Hospital from Site

Hospital Route Map



Hospital Route Map and Driving Directions

1. Head west on East Freeway Service Road toward Monmouth Street (approximately 0.9 miles)
2. Take the ramp on the left to I-10 West
3. Proceed on I-10 West to Exit 781B (approximately 3.7 miles)
4. Exit freeway at Exit 781B onto East Freeway Service Road
5. Continue heading west on East Freeway Service Road (approximately 0.2 miles)
6. Triumph Hospital will be on the right (total distance approximately 5 miles)

Access to I-10 West



Hospital Detail (Egress from I-10 West)

